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18 Attorneys for Defendant

19 GOOGLE LLC

20 **UNITED STATES DISTRICT COURT**

21 **CENTRAL DISTRICT OF CALIFORNIA**

22 **WESTERN DIVISION**

23 JANE DOE, on behalf of herself and
24 all others similarly situated,

25 Plaintiff,

26 v.
27 PHE, INC. and GOOGLE LLC

28 Defendants.

Case No.: 2:24-cv-01065-RGK-SK

[Los Angeles County Superior Court
Case No. 24STCV00181

**DECLARATION OF BENEDICT Y.
HUR IN SUPPORT OF GOOGLE LLC,
MEMORANDUM IN OPPOSITION TO
PLAINTIFF'S MOTION TO REMAND**

CLASS ACTION

Date: April 8, 2024

Time: 9:00 a.m.

Judge: Hon. R. Gary Klausner

Action Filed: January 3, 2024

Removal: February 7, 2024

1 I, Benedict Y. Hur, declare as follows:

2 1. I am a member of the bar of the State of California and a Partner at Willkie
3 Farr & Gallagher LLP, counsel of record for Defendant Google LLC (“Google”) in this
4 action. I submit this declaration in support of Google’s Opposition to Plaintiff’s Motion
5 to Remand. I make this declaration of personal, firsthand knowledge, and if called and
6 sworn as a witness, I could and would testify as set forth below.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the *Frasco v.*
8 *Flo Health, Inc.*, 3:21-cv-00757-JD Consolidated Class Action Complaint, filed Jan.
9 29, 2021. I am counsel of record for Google in this case.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of the *Doe v.*
11 *GoodRx Holdings, Inc.*, 3:23-cv-00501-AMO Consolidated Class Action Complaint,
12 filed Feb. 2, 2023. I am counsel of record for Google in this case.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of *Doe v. Google*
14 *LLC*, 3:23-cv-02431-VC First Amended Consolidated Class Action Complaint, filed
15 May 17, 2023. I am counsel of record for Google in this case.

16 I declare under penalty of perjury of the laws of the United States and the State
17 of California that the foregoing is true and correct.

18 Executed on March 18, 2024, at San Francisco, California.

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20 /s/ Benedict Y. Hur
21 BENEDICT Y. HUR
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